

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
	:	CIVIL NO. 3:24-CR-98
	:	
Vs.	:	
	:	(JUDGE MANNION)
	:	
LAWRENCE MALACHEFSKI	:	
	:	
Defendant	:	(electronically filed)
	:	
	:	

MOTION FOR PERMISSION TO TRAVEL

AND NOW, comes the Defendant, Lawrence Malachefski, by and through his counsel, Lawrence J. Kansky, Esquire, and hereby moves this Honorable Court for permission to travel and avers as follows:

1. On April 30, 2024, Defendant entered a negotiated guilty plea to one (1) count of Federal Wire Fraud (18 U.S.C. § 1343).
2. Defendant has cooperated with his assigned U.S. Probation Officer, Eileen Newcomer.
3. Defendant's pre-sentencing report (PSR) is due on or before June 25, 2024.
4. Defendant is requesting permission from his Honorable Court to travel to the state of New Jersey from July 14th – July 19th.

5. Defendant wishes to take a traditional family vacation to Stone Harbor New Jersey.

6. Defendant's probation officer, Eileen Newcomer, is not opposed to this motion.

7. Defendant has emailed United States Attorney (AUSA), Jeffrey St. John, requesting his concurrence or nonconcurrence on this motion, but has yet to receive a response.

WHEREFORE, Defendant requests that this Honorable Court, without oral argument, grants this Motion for Permission to Travel.

Date: June 14, 2024

Respectfully Submitted,

Lawrence J. Kansky, Esquire

Lawrence J. Kansky, Esquire

Attorney for Defendant

400 Third Ave. STE 312

Kingston, PA 18704

P: (570) 287-1144

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CERTIFICATE OF SERVICE

I hereby certify that on June 14, 2024, I served a copy of Defendant's Motion for Permission to Travel via the Court's ECF system on AUSA counsel, Jeffrey St. John.

Lawrence J. Kansky, Esquire

Lawrence J. Kansky, Esquire

CERTIFICATE OF NON-CONCURRENCE

I, Lawrence J. Kansky, Esquire, counsel for Defendant, Lawrence Malachefski, hereby certify that I contacted AUSA, Jeffrey St. John, via email regarding his concurrence or nonconcurrence to this Motion and have not received a reply.

Date: June 14, 2024

Respectfully Submitted,

Lawrence J. Kansky, Esquire
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